

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERHARD JAKITS,

Defendant

:
:
:
:
:
:
:
:
:
:
:

Case No.: 2-22-CR-194

**(18 USC § 02251 - Sexual exploitation
of children)**

FILED UNDER SEAL

MOTION TO SEAL INDICTMENT

Now comes the United States, by and through its counsel, Assistant United States Attorney Heather A. Hill, for the Southern District of Ohio, and we respectfully request that the Indictment in the above-entitled cause be sealed because the United States is apprehensive that the defendant may flee the jurisdiction or that possibly other evidence may be destroyed if the defendant becomes aware of the existence of said Indictment.

WHEREFORE, the government respectfully requests that the Indictment in this cause be sealed.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/ Heather A. Hill

HEATHER A. HILL (100920)
Assistant United States Attorney
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
(614) 469-5715
Fax: (614) 469-5653
Heather.Hill@usdoj.gov